

January 18, 2019

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW Room TWA325
Washington DC 20554

Re: 5GAA Petition for Waiver to Allow Deployment of Cellular
Vehicle-To-Everything (C-V2X) Technology in the 5.9 GHz Band (GN Docket
No. 18-357)

Dear Ms. Dortch:

The Maryland Department of Transportation (MDOT) is pleased to provide comments to the Federal Communications Commission (FCC) regarding Docket 18-357, 5GAA Petition for Waiver to Allow Deployment of Cellular Vehicle-To-Everything (C-V2X) Technology in the 5.9 GHz Band. Maryland is eager to support the advancement of automated driving systems and connected vehicle technologies that have the potential to significantly impact the safety of our roadways and ultimately our community at large.

The MDOT is a multimodal agency with responsibility for and expertise in roadway and bridge design, motor vehicle safety, transit, bicycle / pedestrian issues, aviation and ports. For more than three years the MDOT has led a public-private working group to address Connected and Automated Vehicle (CAV) issues in Maryland. Our vision is to uphold and enhance a safe, efficient, and equitable transportation future by delivering collaborative and leading-edge CAV solutions. Maryland is open for business and eager to realize the life-saving and economic benefits of CAV technology, while ensuring safety for all. We are embracing CAV technology and innovation through continuing collaboration with partners interested in researching, testing, and implementing CAVs in Maryland.

Specific to this docket, the MDOT believes that C-V2X technology has a promising future, and additional pilot deployments and testing should be encouraged. The MDOT also continues to support ongoing pilot deployments of dedicated short-range communications (DSRC) technology and we are one of many states engaged in the National SPaT Challenge, an effort championed by the American Association of State Highway & Transportation Officials (AASHTO), the Institute of Transportation Engineers (ITE), and the Intelligent Transportation Society of America (ITS America) to better understand how our processes and standards need to change to better accommodate emerging technologies.

We believe that a future including both DSRC and C-V2X would provide the most opportunities for safety benefits to be realized, and support efforts toward universal compatibility in all V2X communications. A fully integrated automated and connected community with vehicle-to-everything (V2X) technology will increase situational awareness by enabling all vehicles in the fleet to communicate with each other and the infrastructure on public roads, thereby greatly improving safety and traffic flow. This future can't be realized if V2X technology isn't interoperable, or worse, if actions taken as a result of this petition jeopardize the availability of spectrum for existing DSRC deployments. As such we urge the commission to use caution in limiting the availability of the 7 channels already in use by DSRC. We are also concerned that any changes in the short term would have the effect of hitting the "reset" button and erasing all the valuable lessons learned and cause significant set-backs to nationwide deployment of life-saving technology.

Finally, as we have said in other filings, MDOT urges the Commission to preserve the full 5.9 GHz spectrum allocation and reserve its availability for transportation safety applications. Preserving the entire allocation will allow these safety applications to achieve their life-saving potential.

Again, MDOT thanks the FCC for providing an opportunity for state and local agencies to comment on this waiver request. MDOT is continuing its efforts to plan for CAV / ADS advancement in Maryland and is pleased to contribute to the national efforts on this important issue. Our agencies will continue to work with federal agencies, other public and private partners, and academic institutions - and most importantly we look forward to a continued partnership with U.S. DOT.

Respectfully submitted,



James F. Ports, Jr., Deputy Secretary
Maryland Department of Transportation



Christine E. Nizer, Administrator
MDOT Motor Vehicle Administration